

ORIGINAL

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

RIVERKEEPER, INC., NATURAL
RESOURCES DEFENSE COUNCIL,
WATERKEEPER ALLIANCE, INC.,
SOUNDKEEPER, INC., DELAWARE
RIVERKEEPER NETWORK, AMERICAN
LITTORAL SOCIETY, RARITAN
BAYKEEPER, INC. d/b/a NY/NJ BAYKEEPER,
SAVE THE BAY – PEOPLE OF
NARRAGANSETT BAY, FRIENDS OF CASCO
BAY, SANTA MONICA BAYKEEPER, INC.,
SURFRIDER FOUNDATION,
MASSACHUSETTS PUBLIC INTEREST
RESEARCH GROUP, INC.

Plaintiffs,

vs.

UNITED STATES ENVIRONMENTAL
PROTECTION AGENCY and STEPHEN L.
JOHNSON, in his official capacity as
Administrator of the United States Environmental
Protection Agency,

Defendants.

Civil Action No. 06 CV 12987
ECF case

**UNOPPOSED
MOTION TO ADMIT COUNSEL
PRO HAC VICE**

S.D. OF N.Y.

2007 FEB 15 PM 2:26

FILED
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Reed Super a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of

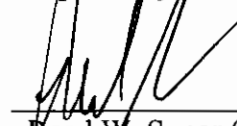
Charles C. Caldart
National Environmental Law Center
3240 Eastlake Avenue E., Suite 100
Seattle, WA 98102
(206) 568-2853
(206) 568-2858 (fax)

Charles C. Caldart is a member in good standing of the Bars of the State of Washington and the Commonwealth of Massachusetts. There are no pending disciplinary proceedings against Charles C. Caldart in any State or Federal court. I am submitting herewith the Affidavit of Reed Super in Support of this Motion.

Dated: New York, NY
February 14, 2007

Of Counsel:
P. Kent Correll, Esq. (PC-2609)
300 Park Avenue, 17th Floor
New York, NY 10022
212-475-3070
212-475-2378 (fax)

Respectfully submitted,



Reed W. Super (RS-3615)
Environmental Law Clinic
Columbia University School of Law
435 West 116th Street
New York, NY 10027
(212) 854-3365
(212) 854-3554 (fax)


support of Plaintiffs' unopposed motion to admit Charles C. Caldart as counsel pro hac vice to represent Plaintiff Massachusetts Public Interest Research Group, Inc. in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 2000. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Charles C. Caldart since 2006.
4. Mr. Caldart is the Litigation Director of the National Environmental Law Center (NELC), which has offices in Boston, MA, Seattle, WA, and San Francisco, CA. He works out of the NELC office in Seattle, WA.
5. I have found Mr. Caldart to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Charles C. Caldart, pro hac vice.
7. I have consulted with counsel for all parties in this matter and each has stated that she/he does not oppose this motion.
8. I respectfully submit a proposed order granting the admission of Charles Caldart, pro hac vice, which is attached hereto as Exhibit A.

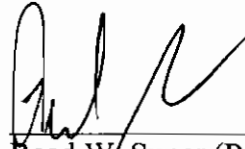
WHEREFORE it is respectfully requested that the motion to admit Charles C. Caldart, pro hac vice, to represent Plaintiff Massachusetts Public Interest Research Group, Inc. in the above captioned matter, be granted.

Dated: New York, NY
February 14, 2007

Notarized:


MARY MARSH ZULACK
Notary Public, State of New York
No. 02ZU5007710
Qualified in Kings County
Commission Expires February 1, 2007

Respectfully submitted,


Reed W. Super (RS-3615)

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Defendants.

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**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN UNOPPOSED
MOTION**

Upon the motion of attorney for and said sponsor attorney's affidavit in support;

IT IS HEREBY ORDERED that

Charles C. Caldart
National Environmental Law Center
3240 Eastlake Avenue E., Suite 100
Seattle, WA 98102
(206) 568-2853
(206) 568-2858 (fax)
Cccnelc@aol.com

is admitted to practice pro hac vice as counsel for Plaintiff Massachusetts Public Interest Group, Inc. in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

February 14, 2007
New York, NY

United States District/Magistrate Judge

IN THE SUPREME COURT OF THE STATE OF WASHINGTON

IN THE MATTER OF THE ADMISSION

BAR # 5563

OF

CERTIFICATE OF GOOD

CHARLES CRAIG CALDART

STANDING

TO PRACTICE IN THE COURTS OF THIS STATE.

I, Ronald R. Carpenter, Clerk of the Supreme Court of the State of Washington, hereby certify

CHARLES CRAIG CALDART

was regularly admitted to practice as an Attorney and Counselor at Law in the Supreme Court and all the Courts of the State of Washington, on October 25, 1974, and is now and has been continuously since that date an attorney in good standing in said Court.



IN TESTIMONY WHEREOF, I have
hereunto set my hand and affixed
the seal of said Court this
29th day of January, 2007

A handwritten signature in black ink, appearing to read "Ronald R. Carpenter".

RONALD R. CARPENTER

SUPREME COURT CLERK

WASHINGTON STATE SUPREME COURT

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.


BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston within and for said County of Suffolk, on the twelfth day of February A.D. 1986, said Court being the highest Court of Record in said Commonwealth:

Charles C. Caldart

being found duly qualified in that behalf, and having taken and subscribed the oaths required by law, was admitted to practice as an Attorney, and, by virtue thereof, as a Counsellor at Law, in any of the Courts of the said Commonwealth: that said Attorney is at present a member of the Bar, and is in good standing according to the records of this Court*.

In testimony whereof, I have hereunto set my hand and affixed the seal of said Court, this second day of February in the year of our Lord two thousand and seven.




MAURA S. DOYLE, Clerk

* Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification.

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of February 2007, I caused to be served by electronic mail one copy of the following:

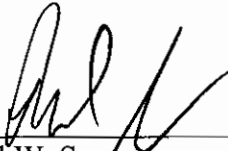
An Unopposed Motion to Admit Counsel Pro Hac Vice for Charles Caldart; and

An Affidavit of Reed Super in Support of this Motion.

on:

Wendy H. Waszmer
Assistant United States Attorney
Southern District of New York
86 Chambers Street, 3rd Floor
New York, New York 10007
Counsel for Defendants

Russell S. Frye
3050 K. Street, NW
Suite 400
Washington, DC 20007-5108
*Counsel for Movant for
Intervention Cooling Water
Intake Structure Coalition*



Reed W. Super